## **REMARKS**

Claims 1-35 are pending after this amendment.

Applicants have amended claims 1-13 and 17-35 in order to more particularly define the invention. The amendments were not necessitated by the claim rejections. Applicants make no admission as to the patentability or unpatentability of the originally filed claims.

The amendments and remarks presented herein are in response to the Office Action dated June 17, 2004.

The Examiner rejected claims 1-35 as being unpatentable over Damashek in view of Ortega. This rejection is respectfully traversed.

Damashek and Ortega are directed at completely different problems:

Damashek presents a method for identifying the topic or language of a document, while Ortega describes techniques for predicting correct spellings in multiple-term queries. There is no hint or suggestion in either reference of combining the references in the manner suggested by the Examiner. In fact, Applicants respectfully submit that little (if any) practical value exists in forming such a combination, since the topic or language identification of Damashek uses n-gram frequency distributions and would therefore benefit little from the addition of the spelling prediction mechanism of Ortega.

Furthermore, neither of the cited references, taken alone or in combination, describes the particular elements claimed herein. Claim 1, as amended, recites "form-

ing a plurality of sub-strings of characters from the query string, the sub-strings having varying lengths." Claims 12, 23, and 34 recite similar limitations. By forming sub-strings in this manner, the present invention provides a mechanism for generating more accurate equivalencing results. As discussed in the specification at paragraphs 0026 to 0031, the variable-length sub-strings can be formed, for example, based on the frequencies of occurrence of the sub-strings in the query string. Claim 6, as amended, recites "successively extending sub-strings based on frequency of occurrence in the modified query string." Claims 17 and 28 recite similar limitations.

Neither of the cited references, taken alone or in any combination, teaches or describes such a technique employing sub-strings of varying lengths. Damashek describes the use of a fixed length for all n-grams; see col. 5, lines 27-28, which specifically states that "n is typically <u>fixed</u> at some value that is useful" (emphasis added). Ortega does not even discuss the use of n-grams. Rather, Ortega merely describes a technique for predicting the correct spelling of search terms within multiple-term search queries based on previously determined relationships between correctly-spelled and incorrectly-spelled search terms.

In addition, Ortega's methodology for predicting correct spellings is entirely different from the technique of the present invention. Ortega utilizes correlation data based on historical query submissions, and more specifically uses frequencies with which search terms have previously occurred together within the same query. Col. 2, paragraph 0021. Thus, Ortega assumes that at least one of the search terms in the entered query is correctly spelled, so that it can be used to predict other terms in the

query that were incorrectly spelled. Ortega would thus fail to provide the text

equivalencing benefits of the present invention, which is capable of identifying a text

equivalent even when the query string does not contain any correctly-spelled words

(or contains just one word, and that word is misspelled).

The remaining claims in the present application are dependent upon the

above-discussed independent claims.

Minor amendments have been made to clarify the nature of the invention and

to correct typographical errors.

On the basis of the above amendments, consideration of this application and

the early allowance of all claims herein are requested.

Should the Examiner wish to discuss the above amendments and remarks, or

if the Examiner believes that for any reason direct contact with Applicants' represen-

tative would help to advance the prosecution of this case to finality, the Examiner is

invited to telephone the undersigned at the number given below.

Respectfully submitted,

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